

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Krista Marie Callander <div style="text-align: right;">Debtor(s)</div> Rocket Mortgage, LLC f/k/a Quicken Loans, LLC <div style="text-align: right;">Movant</div> vs.  Krista Marie Callander <div style="text-align: right;">Debtor(s)</div>  Kenneth E. West <div style="text-align: right;">Trustee</div>		CHAPTER 13     NO. 22-13088 PMM     11 U.S.C. Section 362
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**MOTION OF ROCKET MORTGAGE, LLC F/K/A QUICKEN LOANS, LLC  
FOR RELIEF FROM THE AUTOMATIC STAY  
UNDER SECTION 362**

1. Movant is Rocket Mortgage, LLC f/k/a Quicken Loans, LLC.
2. Debtor(s) is/are the owner(s) of the premises 462 Springdale Avenue, Hatboro, PA 19040, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$247,500.00 on the mortgaged premises that was executed on August 17, 2021. The mortgage has been assigned as follows: FROM Mortgage Electronic Registration Systems, Inc., as mortgagee, as nominee for Rocket Mortgage LLC, FKA Quicken Loans LLC, TO Rocket Mortgage LLC, FKA Quicken Loans LLC, by assignment of mortgage dated November 23, 2022, and recorded in Montgomery County PA on November 29, 2022, at Book MTG BK 15694, PG 02225.
4. Kenneth E. West is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).
6. Debtor(s) has/have failed to make the monthly post-petition mortgage payments in the amount of \$1,643.36, for the months of 02/01/2023 through 05/01/2023, less suspense of \$713.28, plus late charges if applicable.
7. The total amount necessary to reinstate the loan post-petition is \$5,860.16

8. Movant is entitled to relief from stay for cause.

9. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgaged premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Michael P. Farrington

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